

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

0912139 B.C., LTD., a Canadian  
corporation, and PAKAGE APPAREL,  
INC., a Canadian corporation,

Plaintiffs,

v.

RAMPION USA INC., a Washington  
corporation, and RAMPION  
ENTERPRISES LTD., a Canadian  
corporation,

Defendants.

No. 2:18-cv-01464-JLR

**STIPULATED MOTION TO EXTEND  
DEADLINE TO RE-OPEN CASE  
PENDING SETTLEMENT AND  
~~PROPOSED~~ ORDER**

NOTE ON MOTION CALENDAR:

November 8, 2019

Pursuant to LCR 7(d)(1) and 10(g), Plaintiffs and Defendants, by and through their counsel of record, hereby stipulate and jointly move the Court for entry of an order extending the deadline to re-open the case pending the consummation of the formal settlement agreement.

On September 5, 2019, in response to a notice that the parties had reached a settlement in principle, the Court entered an Order (Dkt. # 67) striking all case deadlines and dismissing this case, subject to re-opening at the motion of any party by November 4, 2019, if the parties were unable to consummate their settlement agreement by that time. On October 29, 2019, the parties jointly moved to extend that date to November 13, 2019 (Dkt. # 69). The Court granted that motion on October 30, 2019 (Dkt. # 70). The parties now jointly move to extend the deadline to re-open the case to November 20, 2019.

JOINT MOTION TO EXTEND DEADLINE TO RE-OPEN CASE PENDING SETTLEMENT - 1  
(2:18-cv-01464-JLR)

Good cause exists for this second proposed extension. The parties have nearly completed the formal settlement documents, with only three disputed issues remaining. The parties' binding settlement term sheet was negotiated with the assistance of mediator Lou Peterson and provides that in the event of any disagreement as to the meaning of the terms set forth in the term sheet or in preparation of more formal documentation, the parties agree that Mr. Peterson will resolve any such disagreement. The parties have arranged to present the three remaining disputed issues to Mr. Peterson. Mr. Peterson, who is currently out of town and is mediating a case next week, has asked the parties to submit written materials on the three disputed terms by Tuesday November 12, 2019 followed by a conference call on either Thursday November 14 or Friday November 15. The parties expect Mr. Peterson to provide a final decision on these issues by Monday November 18.

The parties, therefore, seek an extension of the deadline to re-open this case to November 20, 2019 to ensure that there is adequate time to prepare and execute final agreements after receiving Mr. Peterson's final determination.

DATED: November 8, 2019.

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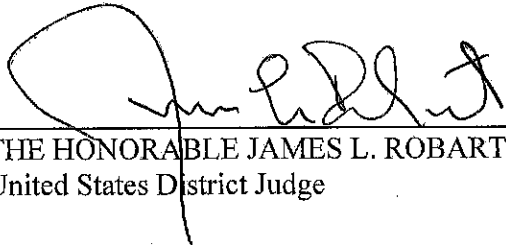
Attorneys for Defendants

JOINT MOTION TO EXTEND DEADLINE TO RE-OPEN CASE PENDING SETTLEMENT - 2  
(2:18-cv-01464-JLR)

**ORDER**

It is so ordered.

Dated this <sup>th</sup> 12 day of Nov., 2019.



THE HONORABLE JAMES L. ROBART  
United States District Judge

JOINT MOTION TO EXTEND DEADLINE TO RE-OPEN CASE PENDING SETTLEMENT - 3  
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